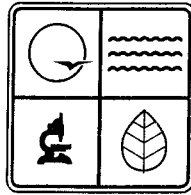


STATE OF MISSOURI
DEPARTMENT OF NATURAL RESOURCES
MISSOURI AIR CONSERVATION COMMISSION



PERMIT BOOK

PERMIT TO CONSTRUCT

Under the authority of RSMo 643 and the Federal Clean Air Act the applicant is authorized to construct the air contaminant source(s) described below, in accordance with the laws, rules and conditions as set forth herein.

Permit Number: **052006-015**

Project Number: 2006-02-073

Owner: McCord Gin Company

Owner's Address: P.O. Box 5, Gideon, MO 63848

Installation Name: McCord Gin Company

Installation Address: 460 State Hwy 162 W., Gideon, MO 63848

Location Information: New Madrid County, S13, T21N, R10E

Application for Authority to Construct was made for:

Installation of one Lummus 158 Imperial II gin stand complete line. This will include one (1) 700 Feeder, one (1) Airjet lint cleaner, and one (1) 86" saw type lint cleaner. This review was conducted in accordance with Section (5), Missouri State Rule 10 CSR 10-6.060, *Construction Permits Required*.

☐ Standard Conditions (on reverse) are applicable to this permit.

☒ Standard Conditions (on reverse) and Special Conditions (listed as attachments starting on page 2) are applicable to this permit.

MAY 19 2006

EFFECTIVE DATE

DIRECTOR OR DESIGNEE
DEPARTMENT OF NATURAL RESOURCES

STANDARD CONDITIONS:

Permission to construct may be revoked if you fail to begin construction or modification within two years from the effective date of this permit. Permittee should notify the Air Pollution Control Program if construction or modification is not started within two years after the effective date of this permit, or if construction or modification is suspended for one year or more.

You will be in violation of 10 CSR 10-6.060 if you fail to adhere to the specifications and conditions listed in your application, this permit and the project review. Specifically, all air contaminant control devices shall be operated and maintained as specified in the application, associated plans and specifications.

You must notify the Air Pollution Control Program of the anticipated date of start up of this (these) air contaminant source(s). The information must be made available not more than 60 days but at least 30 days in advance of this date. Also, you must notify the Department of Natural Resources Regional Office responsible for the area within which you are located within 15 days after the actual start up of this (these) air contaminant source(s).

A copy of this permit and permit review shall be kept at the installation address and shall be made available to Department of Natural Resources' personnel upon request.

You may appeal this permit or any of the listed Special Conditions as provided in RSMo 643.075. If you choose to appeal, the Air Pollution Control Program must receive your written declaration within 30 days of receipt of this permit.

If you choose not to appeal, this certificate, the project review, your application and associated correspondence constitutes your permit to construct. The permit allows you to construct and operate your air contaminant source(s), but in no way relieves you of your obligation to comply with all applicable provisions of the Missouri Air Conservation Law, regulations of the Missouri Department of Natural Resources and other applicable federal, state and local laws and ordinances.

The Department of Natural Resources has established the Outreach and Assistance Center to help in completing future applications or fielding complaints about the permitting process. You are invited to contact them at 1-800-361-4827 or (573) 526-6627, or in writing addressed to Outreach and Assistance Center, P.O. Box 176, Jefferson City, MO 65102-0176.

The Air Pollution Control Program invites your questions regarding this air pollution permit. Please contact the Construction Permit Unit at (573) 751-4817. If you prefer to write, please address your correspondence to the Air Pollution Control Program, P.O. Box 176, Jefferson City, MO 65102-0176, attention Construction Permit Unit.

2006-02-073

McCord Gin Company

P.O. Box 5, Gideon, MO 63848

McCord Gin Company

460 State Hwy 162 W., Gideon, MO 63848

New Madrid County, S13, T21N, R10E

Installation of one Lummus 158 Imperial II gin stand complete line. This will include one (1) 700 Feeder, one (1) Airjet lint cleaner, and one (1) 86" saw type lint cleaner. This review was conducted in accordance with Section (5), Missouri State Rule 10 CSR 10-6.060, *Construction Permits Required*.

Page No.	2
Permit No.	
Project No.	2006-02-073

SPECIAL CONDITIONS:

The permittee is authorized to construct and operate subject to the following special conditions:

The special conditions listed in this permit were included based on the authority granted the Missouri Air Pollution Control Program by the Missouri Air Conservation Law (specifically 643.075) and by the Missouri Rules listed in Title 10, Division 10 of the Code of State Regulations (specifically 10 CSR 10-6.060). For specific details regarding conditions, see 10 CSR 10-6.060 paragraph (12)(A)10. "Conditions required by permitting authority."

McCord Gin Company
New Madrid County, S13, T21N, R10E

1. Emission Limitation
 - A. McCord Gin Company shall emit less than 32.7 tons of particulate matter less than ten (10) microns in diameter (PM₁₀) in any consecutive 12 month period from the entire installation. (Contributions to the 32.7 tons are from the current project limit (15.0 tons per year (tpy)) and from existing equipment capacity 41,500 bales (17.7 tpy).
 - B. McCord Gin Company shall maintain an accurate record of PM₁₀ emitted into the atmosphere from the entire installation. Attachment A or an equivalent form shall be used for this purpose. McCord Gin Company shall maintain all records required by this permit for not less than five (5) years and shall make them available immediately to any Missouri Department of Natural Resources' personnel upon request.
 - C. McCord Gin Company shall report to the Air Pollution Control Program's Enforcement Section, P.O. Box 176, Jefferson City, Missouri 65102, no later than ten (10) days after the end of the month during which the records from Special Condition Number 1.B indicate that the source exceeds the limitation of Special Condition Number 1.A.
2. Cyclones
 - A. The cyclones must be in use at all times when this plant is in operation and shall be operated and maintained in accordance with the manufacturer's specifications.
 - B. McCord Gin Company shall maintain an operating and maintenance log for the cyclone that shall include the following: Incidents of malfunction: with impact on emissions, duration of event, probable cause, and corrective actions.

REVIEW OF APPLICATION FOR AUTHORITY TO CONSTRUCT AND OPERATE
SECTION (5) REVIEW

Project Number: 2006-02-073
Installation ID Number: 143-0023
Permit Number:

McCord Gin Company
460 State Hwy 162 W.
Gideon, MO 63848

Complete: February 22, 2006
Reviewed: March 9, 2006

Parent Company:
McCord Gin Company
P.O. Box 5
Gideon, MO 63848

New Madrid County, S13, T21N, R10E

REVIEW SUMMARY

- McCord Gin Company has applied for authority to construct one Lummus 158 Imperial II gin stand complete line. This will include one (1) 700 Feeder, one (1) Airjet lint cleaner, and one (1) 86" saw type lint cleaner.
- Hazardous Air Pollutant (HAP) emissions are not expected from the proposed equipment.
- None of the New Source Performance Standards (NSPS) apply to the proposed equipment.
- None of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) or currently promulgated Maximum Achievable Control Technology (MACT) regulations apply to the proposed equipment.
- Cyclones are being used to control the particulate matter less than ten (10) microns in diameter (PM₁₀) emissions from the equipment in this permit.
- This review was conducted in accordance with Section (5) of Missouri State Rule 10 CSR 10-6.060, *Construction Permits Required*. Potential emissions of PM₁₀ are conditioned below de minimis levels.
- This installation is located in New Madrid County, an attainment area for all criteria air pollutants.
- This installation is not on the List of Named Installations [10 CSR 10-6.020(3)(B), Table 2].
- Ambient air quality modeling was not performed since potential emissions of the

application are below de minimis levels.

- Emissions testing is not required for the equipment.
- A revision to your Intermediate Operating Permit application is required for this installation within 30 days of equipment startup.
- Approval of this permit is recommended with special conditions.

INSTALLATION DESCRIPTION

McCord Gin Company operates a cotton ginning facility located Gideon, Missouri (New Madrid County). The majority of the facility is “grandfathered” however in order to apply a project limitation the existing installation potential must be capped. As agreed upon by applicant the existing bale maximum of 41,500 bales (equivalent to emissions of 17.37 tons PM₁₀ per year) was taken as the facility cap. Particulate matter emissions from the cotton gin are controlled using cyclones on all exhaust.

McCord Gin Company is a minor source under construction permits and has been issued one previous permit from the Air Pollution Control Program for the construction of a mote press (Permit Number 0993-001). An operating permit renewal (Project Number 2002-08-145) currently is in the technical review stage.

PROJECT DESCRIPTION

McCord Gin Company is applying for the authority to construct one Lummus 158 Imperial II gin stand complete line. This will include one (1) 700 Feeder, one (1) Airjet lint cleaner, and one (1) 86” saw type lint cleaner. The additional exhaust of 8000-cfm resulting from the addition will be controlled with twin 1D-3D 48” cyclones and one (1) Kimball fan. This new addition will increase the ginning capacity by ten (10) bales per hour resulting in a maximum hourly ginning capacity of 48 bales.

EMISSIONS/CONTROLS EVALUATION

The emission factors and control efficiencies used in this analysis were obtained from the Environmental Protection Agency (EPA) document AP-42, *Compilation of Air Pollutant Emission Factors*, Fifth Edition, Chapter 9.7 *Cotton Ginning* (6/96). The existing potential emissions were calculated to incorporate updated emission factors from AP-42. Existing actual emissions are from the 2004 Emissions Inventory Questionnaire (EIQ). Potential emissions of the application represent the potential of the new equipment, assuming continuous operation (8760 hours per year). The following table provides an emissions summary for this project.

Table 1: Emissions Summary (tons per year).

Pollutant	Regulatory <i>De Minimis</i> Levels	Existing Potential Emissions	Existing Actual Emissions (2004 EIQ)	Potential Emissions of the Application	Conditioned Potential of the Application	Installation Conditioned Potential
PM ₁₀	15.0	142.01	17.37	36.77	< 15.0	< 32.7
SO _x	40.0	0.04	0.00	0.00	N/A	N/A
NO _x	40.0	7.01	0.01	0.00	N/A	N/A
VOC	40.0	0.39	0.00	0.00	N/A	N/A
CO	100.0	5.89	0.00	0.00	N/A	N/A
HAPs	10.0/25.0	0.13	0.00	0.00	N/A	N/A

N/A = Not Applicable

PERMIT RULE APPLICABILITY

This review was conducted in accordance with Section (5) of Missouri State Rule 10 CSR 10-6.060, *Construction Permits Required*. Potential emissions of PM₁₀ are conditioned below de minimis levels.

APPLICABLE REQUIREMENTS

McCord Gin Company shall comply with the following applicable requirements. The Missouri Air Conservation Laws and Regulations should be consulted for specific record keeping, monitoring, and reporting requirements. Compliance with these emission standards, based on information submitted in the application, has been verified at the time this application was approved. For a complete list of applicable requirements for your installation, please consult your operating permit.

GENERAL REQUIREMENTS.

- *Submission of Emission Data, Emission Fees and Process Information*, 10 CSR 10-6.110
The emission fee is the amount established by the Missouri Air Conservation Commission annually under Missouri Air Law 643.079(1). Submission of an Emissions Inventory Questionnaire (EIQ) is required April 1 for the previous year's emissions.
- *Operating Permits*, 10 CSR 10-6.065
- *Restriction of Particulate Matter to the Ambient Air Beyond the Premises of Origin*, 10 CSR 10-6.170
- *Restriction of Emission of Visible Air Contaminants*, 10 CSR 10-6.220
- *Restriction of Emission of Odors*, 10 CSR 10-3.090

STAFF RECOMMENDATION

On the basis of this review conducted in accordance with Section (5), Missouri State Rule 10 CSR 10-6.060, *Construction Permits Required*, I recommend this permit be granted with special conditions.

Michael Sanchez
Environmental Engineer

Date

PERMIT DOCUMENTS

The following documents are incorporated by reference into this permit:

- The Application for Authority to Construct form, dated February 14, 2006, received February 17, 2006, designating McCord Gin Company as the owner and operator of the installation.
- U.S. EPA document AP-42, *Compilation of Air Pollutant Emission Factors*, Fifth Edition.
- Southeast Regional Office Site Survey, dated February 27, 2006.

Attachment A – PM₁₀ Compliance Worksheet

McCord Gin Company
New Madrid County, S13, T21N, R10E
Project Number: 2006-02-073
Installation ID Number: 143-0023
Permit Number: _____

This sheet covers the period from _____ to _____.
Copy as needed (month, year) (month, year)

[illegible]

Note 1: Total number of bales produced.

Note 2: Composite PM₁₀ emission factor. Includes haul road and ginning activity.

Note 3: Column 1 x Column 2 x 0.0005.

Note 4: Sum of last 12-months of Column 3*.

*A Ginning 12-Month Total PM₁₀ emissions total of less than 32.7 tons for Column 4 indicates compliance. (15.0 tons from current production increase and 17.7 from existing equipment)

Mr. Jeff Lindsey
Manager
McCord Gin Company
P.O. Box 5
Gideon, MO 63848

RE: New Source Review Permit - Project Number: 2006-02-073

Dear Mr. Lindsey:

Enclosed with this letter is your permit to construct. Please study it carefully. Also, note the special conditions, if any, on the accompanying pages. The document entitled, "Review of Application for Authority to Construct," is part of the permit and should be kept with this permit in your files.

Operation in accordance with these conditions, your new source review permit application and with your amended operating permit is necessary for continued compliance.

The reverse side of your permit certificate has important information concerning standard permit conditions and your rights and obligations under the laws and regulations of the State of Missouri.

If you have any questions regarding this permit, please do not hesitate to contact me at (573) 751-4817, or you may write to me at the Department of Natural Resources, Air Pollution Control Program, P.O. Box 176, Jefferson City, MO 65102.

Sincerely,

AIR POLLUTION CONTROL PROGRAM

Kendall B. Hale
New Source Review Unit Chief

KBH:msl

Enclosures

c: Southeast Regional Office
PAMS File 2006-02-073

Permit Number: